



U.S. Borax Inc.
26877 Tournay Road
Valencia, CA 91355-1847
tel: (1) 661 287 5400
fax: (1) 661 287 5495

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
2000

September 29,

To Whom It May Concern:

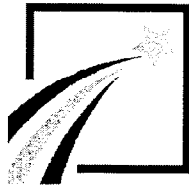
Enclosed please find completed applications for the "National Environmental Performance Track" for our four (4) facilities, all of which are located in California.

Should you have any questions or require amplification to any of the responses please contact Gerald Pepper at (661) 287-5788.

Sincerely,

Gerald Pepper
Manager, Environmental Affairs

cc: Elaine Dorward-King



***National
Environmental
Achievement Track***

Application Form

U.S. Borax Inc. - Valencia Corporate Facility

Name of facility

Rio Tinto Limited

Name of parent company (if any)

26877 Tourney Rd.

Street address

Street address (continued)

Valencia, California 91355-1847

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Gerald M. Pepper

Title Manager, Environmental Affairs

Phone (661) 287-5788

Fax (661) 287-5566

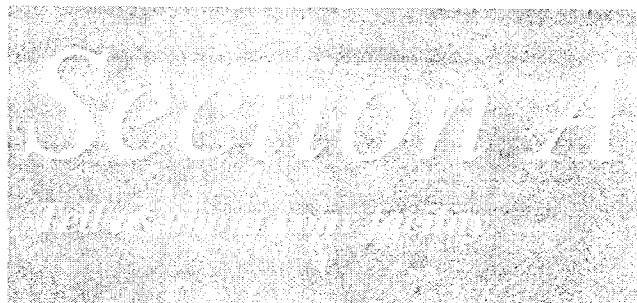
E-mail gerry.pepper@borax.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

There are two primary operations performed at this facility. First, it is the worldwide headquarters and administrative facility for U.S. Borax Inc. Second, it is the main corporate laboratory site where various analytical, research and development activities are conducted for customers and internal corporate needs.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
1474-1,2 2819-1,2

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50
☐ 50-99
☒ 100-499
☐ 500-1,000
☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

CAL000122286

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

Checklist Attached

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

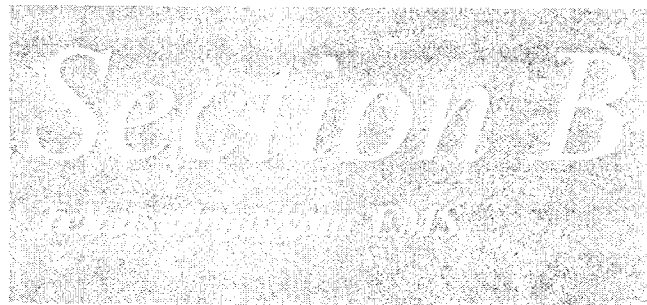
Facility is located in a professional business park/golf course complex. All environmental activities are conducted at "0" or de minimis levels. There are no reportable quantities of chemicals on site. Facility has been ISO14001 registered since December, 1998. Certificate 67061-1 dated December 30, 1998. EMS has been audited at least 9 times since certification. ISO status is current. Registrar is NSF-ISR.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

Internal pre-ISO GAP assessments using employees and consultants.

☒ Third-party assessment

☒ ISO 14001 Certification

☒ Other Independent Compliance Audits

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Electric Energy Conservation	2329080 (metered)	KWH/yr	2047063 (projected)	KWH/yr
<p>i. How is the current level an improvement over the previous level?</p> <p>We have reduced our rate of electric energy consumption by about 7.5% on an annualized basis - reduction in energy use profile has reduced demand costs. Total energy costs have been reduced about 25%.</p> <p>ii. How did you achieve this improvement?</p> <p>Energy-efficient window tinting, energy and heat-reducing light fixture retrofit and shut-down of non-essential electrical systems.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?	What is the current level?												
Irrigation Water Conservation	<table border="1"> <tr> <td>Quantity</td> <td>Units</td> </tr> <tr> <td>4.34</td> <td>MGA</td> </tr> <tr> <td>Metered 97-98 year</td> <td></td> </tr> </table>	Quantity	Units	4.34	MGA	Metered 97-98 year		<table border="1"> <tr> <td>Quantity</td> <td>Units</td> </tr> <tr> <td>3.77</td> <td>MGA</td> </tr> <tr> <td>Metered 99-00 year</td> <td></td> </tr> </table>	Quantity	Units	3.77	MGA	Metered 99-00 year	
Quantity	Units													
4.34	MGA													
Metered 97-98 year														
Quantity	Units													
3.77	MGA													
Metered 99-00 year														
<p>i. How is the current level an improvement over the previous level?</p> <p>We have reduced irrigation water usage by about 15% to date. Program has also reduced water usage elsewhere in complex.</p>														
<p>ii. How did you achieve this improvement?</p> <p>Irrigation system repairs and low-flow modifications, plus reducing irrigation times with automated time clock.</p>														

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Laboratory Industrial Waste Effluent
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 1.62 MGA
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 1.62 MGA
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Our laboratory industrial effluent volume, pH and ion content are currently managed and maintained consistently well within permit limits. The goal of this program is to maintain those permit levels in spite of increases or changes in laboratory activities.

Second aspect you've selected

a. What is the aspect?

Laboratory Hazardous Waste Disposal

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value >1000 lbs/yr
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value >1000 lbs/yr
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Our laboratory operations generate very little hazardous waste. We are permitted by CalEPA as a small quantity generator. The goal of this program is to maintain or reduce the present levels of hazardous waste in spite of increases or changes in lab activities. This is done by careful attention to procedures found in the lab Chemical Hygiene Plan

Third aspect you've selected

a. What is the aspect?

Electric Energy Reduction

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

2047063 KWH/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

2006121 KWH/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

Electric energy conservation survey(s) to determine where savings opportunities exist; with follow-up on those opportunities that have merit. The first survey will determine if an automated HVAC energy management system has merit for this facility

Fourth aspect you've selected

a. What is the aspect?

Irrigation Water Conservation

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

7.45 MGA
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

6.75 MGA
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

By completion of the ongoing water audit program; coupled with further improvements in irrigation system and methods; followed by possible re-landscaping of selected areas to lower or no-water vegetation or rock gardens

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

General community affairs and concerns are tracked by the corporate communications and public affairs groups. Specific environmental inquiries pertaining to the Valencia Facility are directed to the facility environmental manager who is responsible for preparation and delivery of a direct response to the inquiring party. The response is prepared with input from managers and executives involved at the appropriate level. This is addressed in our ISO EMS.

2 How do you inform community members of important matters that affect them?

The Valencia Facility maintains close and active ties with local government officials, organizations and emergency responders. In the event of an emergency or disaster, written programs are in place for authorized company staff to communicate as required with the local community. Our Disaster Management and response plans are available for inspection at any time.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.borax.com

☒ Newspaper

☐ Open Houses

☒ Other

Local community organization meetings, public school awareness programs, etc.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Santa Clarita Valley Chamber of Commerce	Connie Worden-Roberts President	661-295-0006
<i>State/Local Regulator</i>	City of Santa Clarita	George Carvalho City Planner	661-255-4900
<i>Other community/local reference</i>	William S. Hart School District	Robert C. Lee Superintendent	661-254-8653

Section E

Application and Participation Statement.

On behalf of U.S. Borax Inc. - Valencia Corporate Facility
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the *Achievement Track EMS requirements*, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Joseph A. Carrabba 10/27/80

Printed Name/Title Joseph A. Carrabba
Chief Operations Officer

Facility Name U.S. Borax Inc. - Valencia Corporate Facility

Facility Street Address 26877 Tourney Rd.
Valencia, CA 91355-1847

Facility ID Numbers EPA ID# 000122286

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Valencia Corporate Headquarters and Laboratory Facility
Facility Location: 26877 Tourney Rd., Valencia, CA 91355-1847
Facility ID Number(s): EPA ID# CAL000122286
(attach additional sheets if necessary) Los Angeles County HAZMAT/WASTE CUPA ID# 014286-1
County Sanitation Industrial Waste Permit # 12908J

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- 13.
- 14.

<input type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☐
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☒
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☒

- | | |
|---|-------------------------------------|
| 4. Solid Waste Storage and Removal Requirements | <input checked="" type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- | | |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

Water Pollution Control Requirements

- | | |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | <input type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116) | <input type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | <input type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122) | <input type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129) | <input type="checkbox"/> |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | <input type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | <input type="checkbox"/> |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | <input type="checkbox"/> |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | <input type="checkbox"/> |
| 10. Water Quality Standards | <input type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers | <input type="checkbox"/> |
| 12. Permit Monitoring/Reporting Requirements | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge | <input type="checkbox"/> |
| 15. Oil Discharge Containment, Control and Cleanup | <input type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment) | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | |
|---|-------------------------------------|
| 17. Los Angeles County Sanitation District Regulations under Industrial Waste Permit 12908J | <input checked="" type="checkbox"/> |
| 18. | <input type="checkbox"/> |

Drinking Water Regulations

- | | |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141) | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | <input type="checkbox"/> |

5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

2. RCRA Corrective Action (identify)

☐☐☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐